

1 Honorable Thomas S. Zilly  
2  
3  
4  
5  
6  
7

8 **UNITED STATES DISTRICT COURT WESTERN DISTRICT OF  
9 WASHINGTON AT SEATTLE**

10 TALCO SERVICES, LLC,

11 Plaintiff,

12 v.

13 BNSF RAILWAY COMPANY, a  
14 Delaware corporation,

15 Defendant.

16 NO. 17-01516-TSZ

17 STIPULATED MOTION AND  
18 ORDER TO EXTEND EXPERT  
19 DISCLOSURE DEADLINE BY ONE  
20 WEEK (JUNE 25 TO JULY 2, 2018)

21  
22  
23  
24  
25  
26 **STIPULATION**

27 Talco Services, LLC, the Plaintiff, herein ("Talco"), and BNSF Railway Company,  
28 THE Defendant ("BNSF"), by and through their undersigned counsel, stipulate, and  
29 move the Court for entry of the agreed order set forth below extending the deadline  
30 by one week for the disclosure of expert testimony under FRCP 26(a)(2), from  
31 Monday, June 25, 2018 to Monday, July 2, 2018. In the course of discussing AND  
32 finalizing the damages analysis with its damages expert, Talco and its expert  
33 concluded that certain additional information from Talco's records was necessary and  
34

35 STIPULATED MOTION AND ORDER TO  
36 EXTEND EXPERT DISCLOSURE DEADLINE  
37 OF ONE WEEK (JULY 2, 2018)- 1  
(Case No. 17-01516-TSZ)

{17096/008/01685567-1}

38 MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC  
39 ATTORNEYS AT LAW  
40 5500 COLUMBIA CENTER  
41 701 FIFTH AVENUE  
42 SEATTLE, WA 98104-7096  
43 (206) 682-7090 TEL  
44 (206) 625-9534 FAX

1 Talco's Principal, Gregory Nordholm, has been in the field performing a job this week  
2 which has rendered him unable to provide the additional information to Talco's  
3 expert. BNSF is agreeable to a one week extension to accommodate Talco's  
4 circumstances, and BNSF confirms that agreement in the form of this stipulation by  
5 way of the signature of BNSF's counsel below. An extension will not adversely  
6 impact the case schedule or discovery as the discovery cutoff date is September 24,  
7 2018.

9 Dated this 22<sup>nd</sup> day of June, 2018  
10

11 MONTGOMERY PURDUE BLANKINSHIP  
12 & AUSTIN PLLC

13 s/ Michael E. Gossler  
14 Michael E. Gossler, WSBA No. 11044  
15 701 Fifth Avenue, Suite 5500  
16 Seattle, WA 98104  
17 Telephone: (206) 682-7090  
18 Fax: (206) 625-9534  
[mgossler@mpba.com](mailto:mgossler@mpba.com)

19 Attorneys for Plaintiff  
20

21 MONTGOMERY SCARP & CHAIT, PLLC  
22

23 s/ Kelsey Endres  
24 Kelsey Endres, WSBA No. 39409  
25 1218 Third Avenue, Suite 2500  
Seattle, WA 98101  
Telephone: (206) 625-1801  
Fax: (206) 625-1807  
[kelsey@montgomeryscarp.com](mailto:kelsey@montgomeryscarp.com)

26 Attorneys for Defendant  
27  
28

STIPULATED MOTION AND ORDER TO  
EXTEND EXPERT DISCLOSURE DEADLINE  
OF ONE WEEK (JULY 2, 2018)- 2  
(Case No. 17-01516-TSZ)

{17096/008/01685567-1}

MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC  
ATTORNEYS AT LAW  
5500 COLUMBIA CENTER  
701 FIFTH AVENUE  
SEATTLE, WA 98104-7096  
(206) 682-7090 TEL  
(206) 625-9534 FAX

1

2                   **ORDER**

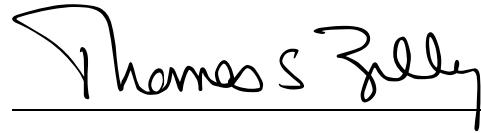
3

4                   The Court being advised of said stipulation, hereby approves an extension of  
5                   the date for disclosure of expert testimony under FRCP 26(a)(2) from June 25, 2018  
6                   to July 2, 2018.

7                   **IT IS SO ORDERED.**

8                   Dated this 27th day of June, 2018.

9

10                  

11                  Thomas S. Zilly  
12                  United States District Judge

13

14

15

16

17

18

19

20

21

22

23

24

25

26                  STIPULATED MOTION AND ORDER TO  
EXTEND EXPERT DISCLOSURE DEADLINE  
OF ONE WEEK (JULY 2, 2018)- 3  
(Case No. 17-01516-TSZ)

{17096/008/01685567-1}

MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC  
ATTORNEYS AT LAW  
5500 COLUMBIA CENTER  
701 FIFTH AVENUE  
SEATTLE, WA 98104-7096  
(206) 682-7090 TEL  
(206) 625-9534 FAX